

Alan R. Ackerman, Esq.  
Law Offices of Alan R. Ackerman  
1719 Route 10 East, Suite 106  
Parsippany, NJ 07054  
973-898-1177  
araesq@alanackermanlaw.com

John P. Fuller, Esq.  
Fuller, Fuller & Associates, P.A.  
12000 Viscayne Blvd., Suite 502  
North Miami, FL 33181  
305-891-5199  
jpf@fullerfuller.com

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
NEWARK DIVISION

THE INDEPENDENCE PROJECT, INC.,  
a New Jersey Non-Profit Corporation, and  
RONALD MOORE, Individually,

Plaintiffs,

v.

Case No: 2:18-cv-13040-WJM-MF

VJ PLAZA, II, L.L.C., a New Jersey  
Limited Liability Company

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

Defendant.

It is hereby stipulated and agreed by and between Plaintiffs, The Independence Project, Inc. and Ronald Moore, and Defendant VJ Plaza, II, LLC, being all of the parties appearing herein, that the within action is dismissed with prejudice and without costs as to any party pursuant to FRCP 41(a)(1)(A)(ii).

Dated: November 8, 2019

Law Offices of Alan R. Ackerman  
*Attorneys for Plaintiffs*

By /s/ Alan R. Ackerman  
Alan R. Ackerman

Shackleton & Hazeltine  
*Attorneys for Defendant*  
By /s/ Kenneth L. Leiby, Jr.  
Kenneth L. Leiby, Jr.

Zirulnik, Sherlock & Demille  
*Attorneys for Defendant as to Count 2*  
By /s/ Joseph E. Kelley  
Joseph E. Kelley